

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Speech-to-Speech and Internet Protocol (IP))	CG Docket No. 08-15
Speech-to-Speech Telecommunications)	
Relay Services)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for)	
Individuals with Hearing and Speech		
Disabilities		

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”) hereby submits these reply comments in response to the Report and Order and Further Notice of Proposed Rulemaking released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding.¹

Sprint applauds the Commission for its continued efforts to examine and to improve Speech-to-Speech (STS) relay services. Sprint has long advocated for improvements to STS in order to better serve Americans with speech disabilities and to ensure functional equivalency. Indeed, in the past twelve months, Sprint has spearheaded several improvements in its STS service including the additions of Wireless STS, STS user profiles, video-assisted STS, and 711 Interactive Voice Response (IVR) menus with direct STS access.

¹ *Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-101 (rel. July 19, 2013) (“Order” or “FNPRM” or “Further Notice”).

Sprint remains committed to working with the Commission, consumer groups, and STS users to improve and grow this underutilized service. As such, Sprint appreciates the opportunity to offer reply comments in this FNPRM proceeding.

STS Compensation

The Commission “generally invite[s] comment on other improvements that can be made to STS consistent with the functional equivalency mandate and section 225 more generally.”² Sprint believes the issue of provider compensation has been largely overlooked in the FNPRM. As noted in joint comments submitted by Speech Communications Assistance by Telephone *et al*, “providers are taking a loss on each STS call” and “[t]o the best of our knowledge, all of the states are paying providers on a per minute basis less than it costs providers to make the service available.”³ The joint commenters aptly draw attention to STS provider compensation.

To rectify inadequate funding of STS, Sprint urges the Commission to change the compensation methodology from conversation minutes to session minutes. The current model – which reimburses providers based only on conversation minutes – does not adequately compensate providers. STS, even more so than traditional TRS, requires a good deal of set-up time to ensure the conversation is effective and a good experience for the STS user.

The Communications Assistant (CA) uses the call set-up time to listen, learn and develop an understanding of the STS users’ speech patterns and abilities so that, when the call is

² FNPRM at ¶ 43.

³ See, Comment submitted jointly by Speech Communications Assistance by Telephone, Deaf and Hard of Hearing Consumer Advocacy Network, Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., American Association of the Deaf-Blind, Cerebral Palsy and Deaf Organization, Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA), and California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc. (Sept, 16, 2013)(“Joint Comments”).

ultimately placed, the CA can relay the call properly. Given the uniqueness of each STS user, this call set-up process can be time consuming. Likewise, wrap-up time (after the STS conversation occurs) is not compensable. During wrap-up time, the CA may provide additional assistance to the STS user such as reviewing notes from the call and answering any questions the STS user may have. Wrap-up time can be fairly lengthy especially for STS users with cognitive or dexterity challenges. Collectively, call set-up and wrap-up time can account for a high percentage of the time the CA spends with the STS user. However, under the Commission's current compensation, none of this session time is compensable.

Sprint understands the importance of the call set-up time and building the relationship and trust of its STS users. In fact, Sprint offers its own Customer Service / Training Line specifically for STS users. Sprint's STS representative will talk one-on-one with the STS user to assist the user in learning how to use the STS service. Sprint's STS representative will answer any questions the STS user may have and fill out a customer profile form (if desired by the STS user). Through this Customer Service / Training Line, Sprint will even help the STS user make practice calls to gain comfort and confidence in using STS service. This is an add-on service for which Sprint does not receive compensation, but one which Sprint believes is important to providing high quality STS service. Nonetheless, to continue providing this high level of service, it is important that Sprint is compensated fairly for the overall STS service that it provides.

As such, to ensure STS is properly funded and to ensure Section 225's goal of functional equivalency is met, Sprint urges the Commission to reexamine STS provider compensation and to adopt a reimbursement model based on session minutes rather than conversation minutes.

Additionally, the Commission should consider compensating providers for care / training minutes.

Customer Profiles

The Commission asks “to what extent should providers be required to allow STS users to create caller profiles” and “what are the costs and benefits of mandating the availability of profiles?”⁴ Sprint generally supports Hamilton’s comments on this topic including that “user profiles for TRS and STS users should be immediately available each time a relay user places a call.”⁵

Sprint supports the use of customer profiles as they have proven to be a very effective means of reducing call set-up time (*i.e.*, creating efficiencies), making the STS call processing smoother, and improving the overall customer experience. With a customer profile, Sprint’s STS CAs have ready access to important information about each STS user including call handling preferences, language preferences, as well as speed dial and contact information (especially emergency contact information).

Sprint does not, however, believe the Commission should create mandates concerning customer profiles. Sprint believes each STS provider is in the best position to determine whether to offer such customer profiles and what elements the customer profile should contain. As such, Sprint believes that STS providers should simply have the Commission’s support to obtain and use the customer profiles without restriction (without, of course, compromising customer consent and approval).

One way in which the Commission can encourage the collection and use of customer profiles would be to allow STS providers the ability to obtain customer profiles during an STS

⁴ NPRM at ¶ 42.

⁵ See, Comments of Hamilton Relay, Inc. at p. 7.

call while receiving compensation (*e.g.*, during call wrap-up). This is a natural opportunity; however, some state contracts restrict the ability of STS providers to engage in such conversation during the course of an STS call. Sprint believes the compensation matter could be addressed by switching (as previously discussed) from conversation minutes to session minutes. Sprint believes that such a compensated in-call or in-session discussion to create a customer/user profile would be essentially a one-time cost that would be recouped quickly as subsequent STS calls would be handled more efficiently.

Registration

Sprint notes that no commenters filed in support of mandatory STS user registration. Likewise, Sprint does not support mandatory registration. Sprint believes STS user registration will serve only to create a barrier for a service the Commission recognizes is “not ... widely utilized.”⁶ As stated in the joint comments submitted by Speech Communications Assistance by Telephone *et al*, “[m]any users already have serious barriers to using STS and it is crucial to not increase those barriers.”⁷ The joint commenters further note that “CAs can easily identify fraudulent STS calls. Once a user has been identified, there is no need to repeat the process, because the likelihood that someone would recover from a speech disability and misuse STS is almost zero.”⁸

Moreover, Sprint believes that the customer profiles accomplish the same goal of providing customer information. However, customer profiles (unlike registration) do not add significant effort or cost on the part of STS users and STS providers. In short, with the very small call volume of STS service and limited and controllable risk of fraud/abuse, Sprint does

⁶ See, FNPRM at ¶ 17.

⁷ See, Joint Comments at p. 7.

⁸ *Id.*

not believe the cost and effort to develop mandatory registration is appropriate in the context of STS.

Respectfully submitted,

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